

1 COOLEY LLP  
2 MICHAEL A. ATTANASIO (151529)  
(mattanasio@cooley.com)  
3 BENEDICT Y. HUR (224018)  
(bhur@cooley.com)  
4 SIMONA AGNOLUCCI (246943)  
(sagnolucci@cooley.com)  
5 EDUARDO E. SANTACANA (281668)  
(esantacana@cooley.com)  
6 ARGEMIRA FLÓREZ (331153)  
(aflorez@cooley.com)  
7 NAIARA TOKER (346145)  
(ntoker@cooley.com)  
8 HARRIS MATEEN (335593)  
(hmateen@cooley.com)  
9 THILINI CHANDRASEKERA (333672)  
(tchandrasekera@cooley.com)  
10 ISABELLA MCKINLEY CORBO (346226)  
(icorbo@cooley.com)  
11 CHELSEA HU (357212)  
(chu@cooley.com)  
12 3 Embarcadero Center, 20th Floor  
San Francisco, CA 94111-4004  
13 Telephone: (415) 693-2000  
Facsimile: (415) 693-2222

14 Attorneys for Defendant  
GOOGLE LLC

20 ANIBAL RODRIGUEZ, et al. individually and  
on behalf of all others similarly situated,

Case No. 3:20-CV-04688-RS

**DECLARATION OF EDUARDO E.  
SANTACANA IN SUPPORT OF GOOGLE  
LLC'S MOTION IN LIMINE NO. 18 TO  
EXCLUDE PLAINTIFFS' EXHIBIT 6**

Dept: 3, 17<sup>th</sup> Fl.  
Judge: Hon. Richard Seeborg

Date Action Filed: July 14, 2020  
Trial Date: August 18, 2025

1 I, Eduardo E. Santacana, hereby declare as follows:

2 1. I am a partner with the law firm Cooley LLP and am counsel for Defendant Google  
3 LLC in the above captioned action. I am duly licensed to practice law in the state of California and  
4 am admitted to practice before this Court. The matters set forth herein are of my own personal  
5 knowledge, and if called as a witness to testify, I could and would testify to these matters. I submit  
6 this declaration in support of Google's Motion *in Limine* No. 18 to Exclude Plaintiffs' Exhibit 6,  
7 filed concurrently herewith.

8 2. Attached hereto as **Exhibit A** is a true and correct copy of Plaintiffs' Exhibit 6 (PX  
9 6).

10 I declare under penalty of perjury under the laws of the State of California and the United  
11 States of America that the forgoing is true and correct.

12 Executed on August 24, 2025, at San Francisco, California.

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15 /s/ Eduardo E. Santacana  
16 Eduardo E. Santacana  
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